① ✓

United States Environmental Protection Agency (EPA)
Region 2
290 Broadway
New York, NY 10007-1866

Underground Storage Tank (UST) Inspection Form

INSPECTOR NAME(S): Luis Diaz / SAIC DATE: 9/25/09

SIC CODE: ICIS #: 180001872 3

I. Location of Tank(s) ☐ Tribal

Facility Name: Total Petroleum 11561 Bo
Street Address: Carr 140, km 65.5 Cruces Davila
City: Barceloneta State: PR Zip Code: 00617 gg
County:
Phone Number: 787 846-4120 Fax Number:
Contact Person(s): Armando Mendez

II. Ownership of Tank(s) ☐ same as location (I.)

Owner Name: Total Petroleum
Street Address: P.O. Box 362916
City: San Juan State: PR Zip Code: 00936
County:
Phone Number: 787-783-4625 Fax Number:
Contact Person(s): Vivian Suarez

IIA. Ownership of Other Facilities

☑ Do you own other UST Facilities ~~Yes~~ / No

If Yes, How many Facilities MANY How many USTs MANY

III. Notification

☑ Notification to implementing agency; name EQB, Expires 11/09
State Facility ID # 86-1176

IV. Financial Responsibility NA

☐ State Fund ☐ Private Insurance: Insurer/Policy #
☐ Guarantee ☐ Surety Bond ☐ Letter of Credit
☐ Local Government ☐ Self Insured ☐ **Not Required** (Federal & State government, hazardous substance USTs)

V. Release History N/A ☑

☐ To your knowledge, are there any public or private Drinking Water Wells in the vicinity ? **Yes / No**

☐ Evidence of release or spills at facility ☐ Greater than 25 gallons (estimate)
☐ **Releases reported to implementing agency; if so, date(s)** [280.53] NA
☐ Release confirmed; when and how
☐ Initial abatement measures and site characterization ☐ Free product removal
☐ Soil or ground water contamination ☐ Corrective action plan submitted
☐ Remediation ongoing ☐ Remediation completed, no further action; date(s)

Notes:

VI. Tank Information	Tank No.	1	2				
Tank presently in use		Yes →					
If not, date last used	(see Section XII)	NA →					
If empty, verify 1" or less left	(see Section XII)	NA →					
Capacity of Tank (gal)		10,000 →					
Substance Stored		Gas-R	Gas-P				
M/Y Tank installed / Upgraded		1993 →					
Tank Construction : Bare steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted, Double-walled (DW)		FRP →					
Spill Prevention		Yes →					
Overfill Prevention (specify type) ATG		Yes →		①			
Special Configuration: Compartmentalized , Manifolded		No →					

VII. Piping Information							
Piping Type : Pressure, Suction		P →					
Piping Construction: Bare steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW)		No →					

Tank and Piping Notes: ① ATG is equipped with functional external audible/visual overfill alarm.

VIII. Cathodic Protection		N/A ☑					
Integrity Assessment conducted prior to upgrade							
Interior Lining:	Interior lining inspected						
Impressed Current	CP Test records						
	Rectifier inspection records						
Sacrifical Anode:	CP test records						

CP Notes:

Init/Date 9/25/09

	Tank No.	1	2				
IX. UST system used solely by Emergency Power Generator		No →					
X. Release Detection		N/A ☐					
Tank RD Methods	ATG	Yes →					
	Interstitial Monitoring	No →					
	Groundwater Monitoring	No →					
	Vapor Monitoring	No →					
	Inventory Control w/ TTT	No →					
	Manual Tank Gauging	No →					
	Manual Tank Gauging w/ TTT	No →					
	SIR	No →					
12 Months Passing Monitoring Records		No →		①			

Tank RD Notes: ① Neither current ~~history~~ results or historical results of release detection monitoring are available from ATG. Results are only available for 2006 and 2007 from ATG.

Pressurized Piping RD Methods		N/A ☐					
	Interstitial Monitoring	No →					
	Groundwater Monitoring	No →					
	Vapor Monitoring	No →					
	SIR	No →					
12 Months Passing Monitoring Records							
	Annual Line Tightness Test	No →		②			
ALLD	Present	Yes →					
	Annual Test	No →		③			

Piping RD Notes: ② & ③ Records of annual ALLD function or line tightness testing not available.

Init/Date D 9/25/09

XI. Repairs

N/A ☑

Repaired tanks and piping are tightness tested within 30 days of repair completion	Y ☐ N ☐ **Unknown** ☐
CP systems are tested/inspected within 6 months of repair of any cathodically protected UST system	Y ☐ N ☐ **Unknown** ☐
Records of repairs are maintained	Y ☐ N ☐ **Unknown** ☐

XII. Temporary Closure

N/A ☑

CP continues to be maintained	Y ☐ N ☐ **Unknown** ☐
UST system contains product and release detection is performed	Y ☐ N ☐ **Unknown** ☐
Cap and secure all lines, pumps, manways	Y ☐ N ☐ **Unknown** ☐

Notes: ① Both monitoring wells on-site are ~~unsecured~~ unsecured.

Init/Date JD 9/25/09

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA) REGION 2
UST PROGRAM
Ground Water Compliance Section
New York, NY 10007-1866

Inspector Observation Report

Inspection of Underground Storage Tanks (USTs)

☐ No violations observed at the conclusion of this inspection.

☑ The above named facility was inspected by a duly authorized representative of EPA Region 2, and the following are the inspector's observations and/or recommended corrective action(s):

Violations Observed:

Regulatory Citation	Violation Description
§ 280.43 (f)(g)	Monitoring wells are unsecured. Note D, pg 4
§ 280.41(a)	Release detection monitoring records are insufficient
§ 280.44(a)	Lack of ALLD annual function testing
§ 280.44(b)	Lack of annual line tightness test records.
§	
§	
§	
§	

Actions Taken:
☐ Field Citation; # _____ ☑ Additional information required ☑ On-site request/Due date 9/28/09

Comments/Recommendations:

Requested records related to ~~recs~~ current release detection monitoring & ALLD function and line tightness testing.

Name of Owner/Operator Representative:	Name of EPA Inspector/representative
Joel Gatti (Please print)	Luis Diaz (Please print)
(Signature)	(Signature)
Other Participants:	(Credential Number)
	Date of Inspection 9/25/09 Time 0920 AM/PM

Init/Date 9/25/09

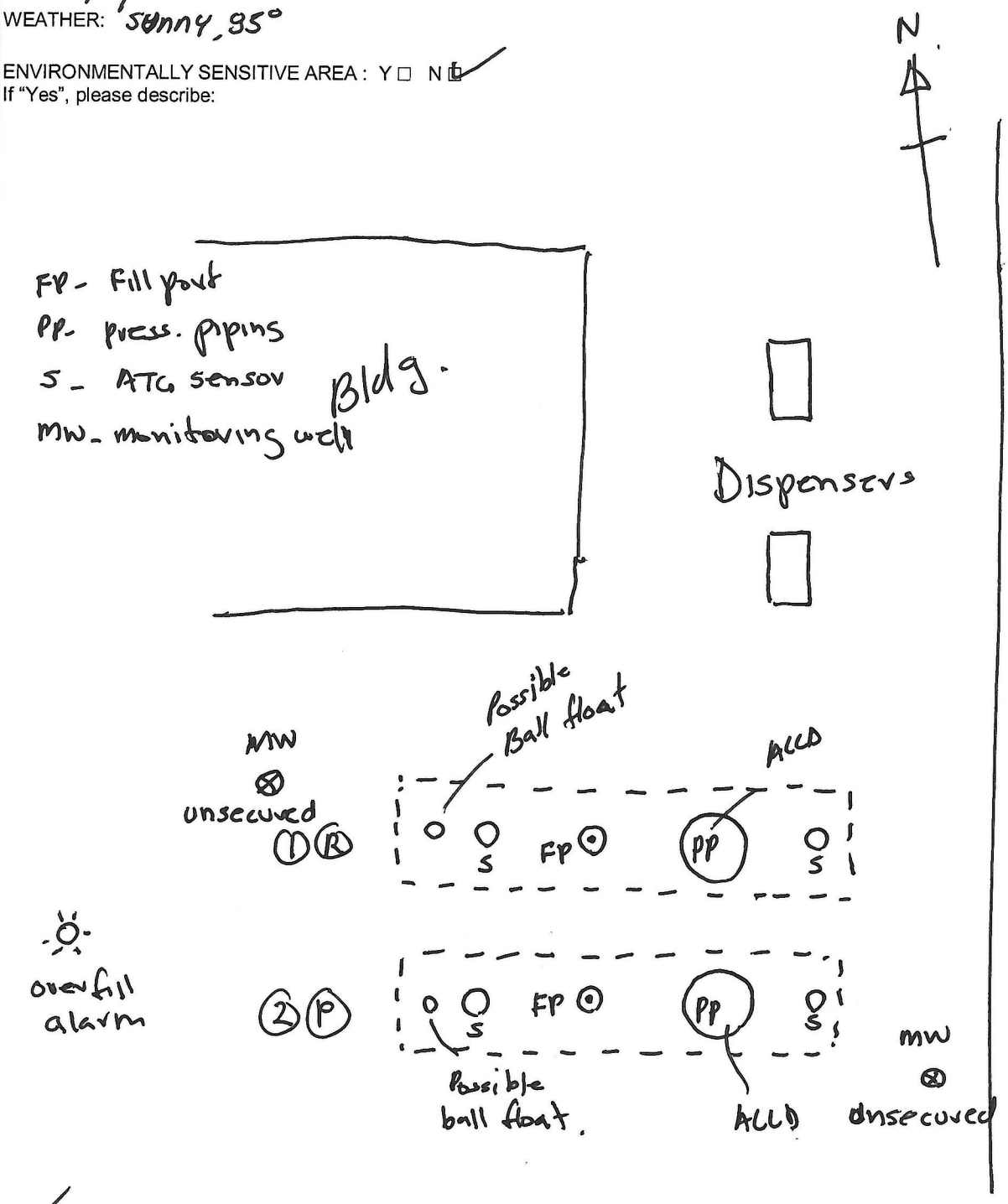
SITE DRAWING

N. 18°, 26', 0.7"
W. 66°, 33', 52.6"

DATE: 9/25/09 TIME ON SITE: 0830 AM TIME OFF SITE: 0920 AM

WEATHER: Sunny, 95°

ENVIRONMENTALLY SENSITIVE AREA : Y ☐ N ☑
If "Yes", please describe:



☑ Pictures

Required Fields to be used for ICIS Only

Compliance Monitoring

Activity: UST Inspection

Inspection Conclusion Data Sheet

1) Did you observe deficiencies (preferred violations) during the on-site inspection? Yes

Deficiencies observed: (Put an **X** for each observed deficiency)

___ Potential failure to complete or submit a notification, report, certification, or manifest

X Potential failure to follow or develop a required management practice or procedure

X Potential failure to maintain a record or failure to disclose a document

X Potential failure to maintain/inspect/repair meters, sensors, and recording equipment

___ Potential failure to report regulated events, such as spills, accidents, etc.

2) If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? **Yes / No**

3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? **Yes / No**

If yes, what actions were taken?

4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector In providing Compliance Assistance during Inspections? **Yes / No**

5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the inspection? **Yes / No**

Init/Date 9/25/09

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
I. Spill Prevention	1	Spill prevention device is present and functional. [280.20(c)(1)(i), 280.21(d)]		✓	
II. Overfill Prevention	2	Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)]		✓	
		☐ Automatic shutoff is operational (ie., device not tampered with or inoperable) [280.20(c)(1)(ii)(A), 280.21(d)]			
		☑ Alarm is operational. [280.20(c)(1) (ii)(B), 280.21(d)]			
		☑ Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)]			
		☐ Ball float is operational. [280.20(c)(1)(ii)(B), 280.21(d)]			
III a. Operation and Maintenance	3	Repaired tanks and piping were tightness tested within 30 days of repair completion (not required w/internal inspections or if monthly monitoring is in use). [280.33(d)]	✓		
III b. Operation and Maintenance of Corrosion Protection	4	CP systems were tested/inspected within 6 months of repair of any cathodically protected UST system. [280.33(e)]	✓		
	5	Corrosion protection system is properly operated and maintained to provide continuous protection. [280.31(a)(b), 280.70(a)]	✓		
		☐ UST system (Choose one)			
		☐ UST in operation			
		☐ UST in temporary closure			
		☐ CP System is properly operated and maintained			
		☐ CP system is performing adequately based on results of testing. [280.31(b)]; - or -			
		☐ CP system tested within required period and operator is conducting or has completed appropriate repair in response to test results reflecting CP system not providing adequate protection.			

Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
III b. Operation and Maintenance of Corrosion Protection (Continued)	6	UST systems with impressed current cathodic protection are inspected every 60 days. [280.31(c)]	✓		
	7	Lined tanks are inspected periodically and lining is in compliance. [280.21(b)(1)(ii)]	✓		
IV. Tank and Piping Corrosion Protection	8	Buried metal tank and piping (which includes fittings, connections, etc.) is corrosion protected. [280.20(a), 280.20(b), 280.21(b), 280.21(c)]	✓		
		❑ Buried metal piping components (such as swing joints, flex-connector, etc.) are isolated from the soil or cathodically protected. For new USTs – tanks and piping installed after 12/22/88 [280.20(a), 280.20(b)]: ❑ Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)] ❑ Tank is fiberglass, clad, or jacketed and piping is fiberglass or flexible plastic. [280.20(a)(1), 280.20(a)(3), 280.20(a)(5), 280.20(b)(1), 280.20(b)(4)] ❑ Records are available to document that CP is not necessary. [280.20(a)(4)(ii), 280.20(b)(3)(ii)] For existing USTs – tanks and piping installed on or before 12/22/88 [280.21(b), 280.21(c)]: ❑ Tank and piping meet new UST requirements [280.21(a)(1)] ❑ Steel tank is internally lined. [280.21 (b)] ❑ Metal tank and piping are cathodically protected. [280.21(b)(2), 280.21(c)]			

Notes: N/A – Indicates that the measure is not applicable.
Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Prevention Compliance Measures.
In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

Release Detection Compliance Measures Matrix

Instructions – To Determine Compliance Status of Measures #1-7,
Work Through the Worksheet "Commonly Used Release Detection Methods" Below.

Regulatory Subject Area	Measure #	SOC Measure/ Federal Citation	In Compliance? N/A	Y	N
I. Release Detection Method Presence and Performance Requirements	1	Release detection method is present. [280.40(a)]		✓	
	2	Release detection system is operating properly (i.e., able to detect a release from any portion of the system that routinely contains product). [(280.40(a)(1)]		~~✓~~ ?	unk
	3	Release detection system meets the performance standards at 280.43 or 280.44. [(280.40(a)(3)]		~~✓~~	unk
	4	Implementing agency has been notified of suspected release as required. [(280.40(b)]	✓		
		☐ Non-passing results reported and resolved in accordance with implementing agency's directions. [280.40(b)]			
II. Release Detection Testing	5	Tanks and piping are monitored monthly for releases and records are available (must have records for the two most recent consecutive months and for 8 months of the last 12 months). [280.41(a), and 280.45(b)]			✓
III. Hazardous Substance UST Systems	6	Hazardous substance UST system leak detection meets the requirements (i.e., either secondarily contained or otherwise approved by the implementing agency). [280.42(b)]	✓		
IV. Temporary Closure	7	Release detection requirements are complied with (i.e., method present, operational, releases investigated and reported as required) for UST systems containing product. [280.70(a)]	✓		

Worksheet - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
☐ NA			**A. Inventory Control with Tank Tightness Testing (T.T.T)** ☐ Inventory control is conducted properly. ☐ T.T.T. performed as required (See "D" below). ☐ Inventory volume measurements for inputs, withdrawals, and remaining amounts are recorded each operating day and reconciled as required. [280.43(a)(1), 280.43(a)(3)] ☐ Equipment is capable of 1/8-inch measurement. [280.43(a)(2)] ☐ Product dispensing is metered and recorded within local standards for meter calibration to required accuracy. [280.43(a)(5)] ☐ Water is monitored at least monthly. [280.43(a)(6)]

Release Detection Compliance Measures Matrix

Worksheet (Continued) - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
☒			**B. Automatic Tank Gauge (ATG)** ☐ ATG is set up properly. [280.40(a)(2)] ☐ ATG can detect a 0.2 gal/hr leak rate from any portion of the tank routinely containing product. [280.43(d)(1)] ☐ ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]
☐ NA			**C. Manual Tank Gauging (MTG)** ☐ Tank size is appropriate for using MTG. [280.43(b)(5)] ☐ Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.T.T. (See "D" below) ☐ Method is being conducted correctly. [280.43(b)(4)] ☐ No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] ☐ Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]
☐ NA →	☐	☐	**D. Tightness Testing** (Safe Suction piping does not require testing) ☐ Testing method is capable of detecting a 0.1 gal/hr leak rate from any portion of tank routinely containing product. [280.43(c)] ☐ Tightness testing is conducted within specified time frames for method: ☐ **Tanks** – every 5 years [280.41(a)(1)] ☐ **Pressurized Piping** – annually [280.41(b)(1)(ii)] ☐ **Non-exempt suction piping** – every 3 years [280.41(b)(2)] ☐ Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]
☐ NA →	☐	☐	**E. Ground Water or Vapor Monitoring** ☐ Ground water in the monitoring well is never more than 20 feet from the ground surface. [280.43(f)(2)] ☐ Vapor monitoring well is not affected by high ground water. [280.43(e)(3)] ☐ Site assessment has been done for vapor or ground water monitoring. [280.43(e)(6), 280.43(f)(7)] ☐ Wells are properly designed and positioned. [280.43(e)(6), 280.43(f)(7)]
☐ NA →	☐	☐	**F. Interstitial Monitoring** ☐ Secondary containment can be used to detect a release [280.43(g)(1)], 280.43(g)(2)] ☐ Sensor properly positioned. [280.40(a)(2)]

Release Detection Compliance Measures Matrix

Worksheet (Continued) - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
	☒		**G. Automatic Line Leak Detector (ALLD)** ☐ ALLD is present and operational. [280.44(a)] ☐ Annual function test of the ALLD has been conducted and records are available. [280.44(a)]
☐ N/A →	☐	☐	**H. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]** ☐ The method can detect a 0.2 gal/hr leak rate or a release of 150 gal within a month and meet the 95/5 requirement [280.43(h)(1)]; or ☐ The implementing agency has approved the method as being as effective as tank tightness testing, automatic tank gauging, vapor monitoring, ground water monitoring, or interstitial monitoring and the operator complies with any conditions imposed by agency. [280.43(h)(2)] ☐ S.I.R. - Results are received within time frame established by implementing agency. [280.41(a) & 280.43(h)]

Notes: N/A – Indicates that the measure is not applicable.

Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Detection Compliance Measures.

In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

273874 241306
AMARMANDO ESSO C-134
C.140 K65 BARCELONET
F03173963405011

SEP 25. 2009 9:23 AM

LEAK TEST REPORT

T 2:PREMIUM
PROBE SERIAL NUM 811857

TEST STARTING TIME:
MAY 5. 2008 2:37 PM

TEST LENGTH = 19.0 HRS
STRT VOLUME = 643.7 GAL

START TEMP = 89.4 F
END TEMP = 89.2 F

TEST PERIODS 2-38

0.00	0.02	0.02	0.03
0.03	0.03	0.03	0.04
0.05	0.05	0.05	0.06
0.05	0.06	0.07	0.07
0.08	0.08	0.08	0.09
0.09	0.09	0.09	0.09
0.09	0.09	0.09	0.09
0.10	0.10	0.11	0.10
0.10	0.11	0.11	0.11
0.11			

LEAK TEST RESULTS
RATE = 0.00 GAL/HR
0.20 GAL/HR TEST INVL

0.20 GAL/HR FLAGS:
LOW LEVEL TEST ERROR
PERCENT VOLUME TOO LOW

* * * * * END * * * * *

273874 241306
AMARMANDO ESSO C-134
C.140 K65 BARCELONET
F03173963405011

SEP 25. 2009 9:22 AM

LEAK TEST REPORT

T 1:REGULAR
PROBE SERIAL NUM 811841

TEST STARTING TIME:
FEB 26. 2008 11:30 AM

TEST LENGTH = 2.0 HRS
STRT VOLUME = 366.9 GAL

START TEMP = 87.6 F
END TEMP = 88.4 F

TEST PERIODS 2-4
-0.60 -1.42 -1.37

LEAK TEST RESULTS
RATE = -0.90 GAL/HR
0.20 GAL/HR TEST INVL

0.20 GAL/HR FLAGS:
LOW LEVEL TEST ERROR
CHANGE IN TANK TEMP ZONE
TEMP CHANGE TOO LARGE
PERCENT VOLUME TOO LOW
INVALID FUEL LEVEL

* * * * * END * * * * *

273874 241306
AMARMANDO ESSO C-134
C.140 K65 BARCELONET
F03173963405011

SEP 25. 2009 9:23 AM

TANK LEAK TEST HISTORY

T 2:PREMIUM

LAST GROSS TEST PASSED:
MAY 5. 2008 6:24 AM
STARTING VOLUME= 812
PERCENT VOLUME = 8.4
TEST TYPE = STANDARD

LAST ANNUAL TEST PASSED:
SEP 1. 2005 0:00 AM
TEST LENGTH 0 HOURS
STARTING VOLUME= 0
PERCENT VOLUME = 0.0
TEST TYPE = STANDARD

FULLEST ANNUAL TEST PASS

NO TEST PASSED

LAST PERIODIC TEST PASS:
AUG 31. 2007 10:36 PM
TEST LENGTH 8 HOURS
STARTING VOLUME= 2907
PERCENT VOLUME = 30.0
TEST TYPE = STANDARD

FULLEST PERIODIC TEST
PASSED EACH MONTH:

JAN 18. 2007 10:32 PM
TEST LENGTH 6 HOURS
STARTING VOLUME= 3068
PERCENT VOLUME = 31.7
TEST TYPE = STANDARD

FEB 13. 2007 10:34 PM
TEST LENGTH 7 HOURS
STARTING VOLUME= 3334
PERCENT VOLUME = 34.4
TEST TYPE = STANDARD

JUL 31. 2006 10:09 PM
TEST LENGTH 8 HOURS
STARTIN[illegible]LUME= 3465
PERCENT [illegible]LUME = 35.8
TEST TYPE = STANDARD

AUG 31. 2007 10:36 PM
TEST LENGTH 8 HOURS
STARTING VOLUME= 2907
PERCENT VOLUME = 30.0
TEST TYPE = STANDARD

NOV 19. 2006 7:22 PM
TEST LENGTH 11 HOURS
STARTING VOLUME= 3676
PERCENT VOLUME = 38.0
TEST TYPE = STANDARD

DEC 8. 2006 10:51 PM
TEST LENGTH 8 HOURS
STARTING VOLUME= 3609
PERCENT VOLUME = 37.3
TEST TYPE = STANDARD

* * * * END * * * * *

274 241306
FERNANDO ESSO C-134
AV 1.65 BARCELONET
963405011

SEP 25. 2009 9:22 AM

TANK LEAK TEST HISTORY

T 1:REGULAR

LAST GROSS TEST PASSED:
FEB 19. 2008 11:21 PM
STARTING VOLUME= 2686
PERCENT VOLUME = 27.7
TEST TYPE = STANDARD

LAST ANNUAL TEST PASSED:
JAN 13. 2008 8:39 PM
TEST LENGTH 8 HOURS
STARTING VOLUME= 5731
PERCENT VOLUME = 59.2
TEST TYPE = STANDARD

FULLEST ANNUAL TEST PASS
JAN 1. 2008 11:34 PM
TEST LENGTH 6 HOURS
STARTING VOLUME= 5805
PERCENT VOLUME = 59.9
TEST TYPE = STANDARD

LAST PERIODIC TEST PASS:
JAN 19. 2008 11:49 PM
TEST LENGTH 8 HOURS
STARTING VOLUME= 4594
PERCENT VOLUME = 47.4
TEST TYPE = STANDARD

FULLEST PERIODIC TEST
PASSED EACH MONTH:

JAN 1. 2008 11:34 PM
TEST LENGTH 6 HOURS
STARTING VOLUME= 5805
PERCENT VOLUME = 59.9
TEST TYPE = STANDARD

MAR 22. 2007 10:22 PM
TEST LENGTH 7 HOURS
STARTING VOLUME= 5788
PERCENT VOLUME = 59.8
TEST TYPE = STANDARD

MAY 20. 2007 8:23 PM
TEST LENGTH 8 HOURS
STARTING VOLUME= 4703
PERCENT VOLUME = 48.5
TEST TYPE = STANDARD

JUN 17. 2007 8:11 PM
TEST LENGTH 9 HOURS
STARTING VOLUME= 5604
PERCENT VOLUME = 57.9
TEST TYPE = STANDARD

AUG 26. 2007 7:54 PM
TEST LENGTH 9 HOURS
STARTING VOLUME= 3756
PERCENT VOLUME = 38.8
TEST TYPE = STANDARD

SEP 4. 2007 10:52 PM
TEST LENGTH 6 HOURS
STARTING VOLUME= 5879
PERCENT VOLUME = 60.7
TEST TYPE = STANDARD

OCT 13. 2007 11:34 PM
TEST LENGTH 7 HOURS
STARTING VOLUME= 4415
PERCENT VOLUME = 45.6
TEST TYPE = STANDARD

NOV 23. 2006 10:04 PM
TEST LENGTH 8 HOURS
STARTING VOLUME= 7529
PERCENT VOLUME = 77.8
TEST TYPE = STANDARD

DEC 26. 2007 11:31 PM
TEST LENGTH 6 HOURS
STARTING VOLUME= 6275
PERCENT VOLUME = 64.8
TEST TYPE = STANDARD

* * * * * END * * * * *

Picture 1 - General Site Picture

Picture 2 – Tank 1 sump with pressurized piping, ALLD, and ATG sensor

Picture 3 – Tank 2 sump with pressurized piping, ALLD, and ATG sensor

Picture 4 –Unsecured groundwater monitoring well